

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARNOLD WANDEL, derivatively on behalf of
Nominal Defendant WEATHERFORD
INTERNATIONAL LTD.

Plaintiff,

12 Civ. 1305 (LAK)

v.

BERNARD J. DUROC-DANNER, CHARLES E.
GEER, JR., JESSICA ABARCA, WILLIAM E.
MACAULAY, ROBERT K. MOSES, JR.,
ROBERT A. RAYNE, and ANDREW P. BECNEL,

Defendants,

and

WEATHERFORD INTERNATIONAL LTD.,

Nominal Defendant.

NOTICE OF JOINT MOTION FOR APPROVAL OF NOTICE OF SETTLEMENT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the exhibits attached thereto, and all prior pleadings and proceedings, Plaintiff Arnold Wandel, (“New York Plaintiff”), derivatively on behalf of Weatherford International Ltd. (“Weatherford” or the “Company”), Nominal Defendant Weatherford, and Individual Defendants Bernard J. Duroc-Danner, Charles E. Geer, Jr., Jessica Abarca, William E. Macaulay, Robert K. Moses, Jr., Robert A. Rayne, and Andrew P. Becnel (collectively, “Defendants”), hereby jointly move this Court, at the United States District Court for the Southern District of New York, before the Honorable Lewis A. Kaplan, located at 500 Pearl Street, New York, New York 10007, for an Order approving the content, form and manner of providing notice of the Settlement entered into among: (1) New York Plaintiff, derivatively on behalf of nominal defendant Weatherford; (2)

Plaintiff Iron Workers Mid-South Pension Fund (“Texas Plaintiff,” together with New York Plaintiff, “Plaintiffs”),¹ derivatively on behalf of nominal defendant Weatherford; and (3) Defendants to the above-captioned action (the “New York Action”) as well as the derivative action captioned *Iron Workers Mid-South Pension Fund v. Duroc-Danner, et al.*, No. 2011-19822 (165th Dist. Ct., Harris County, Tex.) (the “Texas Action,” together with the New York Action, the “Actions”) as set forth in the Amended Stipulation executed on November 25, 2014 (the “Amended Stipulation”) and attached as Exhibit 1 to the Parties’ Memorandum of Law in Support of Joint Motion for Approval of Notice of Settlement and Settlement Hearing Date, filed with the Court on November 25, 2015 (Dkt. 48).

Dated: March 11, 2015

Respectfully submitted,

FEDERMAN & SHERWOOD

By: /s/ William B. Federman (on consent)²
William B. Federman (WBF9124)
10205 North Pennsylvania Ave.
Oklahoma City, OK 73120
Tel: (405) 235-1560
Fax: (405) 239-2112
wbf@federmanlaw.com

-and-

2926 Maple Avenue, Suite 200
Dallas, TX 75201

Marc S. Henzel
LAW OFFICES OF MARC S. HENZEL
431 Montgomery Ave., Suite B

LATHAM & WATKINS LLP

By: /s/ Peter A. Wald
Peter A. Wald (*pro hac vice*)
505 Montgomery Street, Suite 2000
San Francisco, CA 94111-2562
Tel: (415) 391-0600
Fax: (415) 395-8095

Kevin H. Metz (*pro hac vice*)
555 Eleventh St. NW, Suite 1000
Washington, DC 20004
Tel: (202) 637-2200
Fax: (202) 637-2201
kevin.metz@lw.com

*Attorneys for Defendants Bernard J.
Duroc-Danner, Jessica Abarca, Charles*

¹ Hereinafter, Plaintiffs and Defendants are collectively referred to herein as the “Parties.”

² Plaintiff uses an electronic signature with consent in accordance with Rule 8.5(b) of the Court’s ECF Rules and Instructions.

Merion Station, PA 19066
Tel: (610) 660-8000
Fax: (610) 660-8080

Attorneys for Plaintiff Arnold Wandel

*E. Geer Jr., William E. Macaulay,
Robert K. Moses, Robert A. Rayne, and
Andrew P. Becnel and Nominal
Defendant Weatherford International
Ltd.*